

**LAW OFFICES OF GEORDAN GOEBEL**  
**GEORDAN GOEBEL** [SBN# 149513]  
**YAN GERSHFELD** [SBN# 251375]  
**W. JUSTIN CLARK** [SBN# 268827]

155 Granada Street, #M2  
Camarillo, CA 93010-7725  
Phone (805) 482-7966

**LAW OFFICES OF TERRENCE A. BEARD**  
**TERRENCE A. BEARD** [SBN# 98013]

525 Marina Blvd.  
Pittsburg, CA 94565  
Phone (925) 778-1060

Attorney for Plaintiff,  
STATE FARM GENERAL INSURANCE COMPANY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

STATE FARM GENERAL INSURANCE  
COMPANY,

Plaintiff,

vs.

No: 4:11-CV-00387 PJH

**REQUEST TO RESCHEDULE  
INITIAL CASE MANAGEMENT  
CONFERENCE**

KENNETH WELCH, individually and dba  
KENNY'S ROD SHOP and KENNY  
WELCH'S ROD SHOP; KENNY'S ROD  
SHOP, LLC, also known and doing  
business as KENNY'S ROD SHOP -  
FABRICATION DIVISION and  
KENNY'S ROD SHOP - PARTS, and  
DOES 1 to 50, inclusive,

Defendants.

AND RELATED THIRD PARTY  
COMPLAINT

1 Plaintiff State Farm General Insurance Company, defendant/third party  
2 complainant Kenneth Welch, and third party defendant/cross-complainant CPI Global  
3 Sourcing, Inc. hereby request that the court reschedule the Case Management Conference in  
4 the above-entitled action, currently set for September 15, 2011 at 2:00 P.M. for the following  
5 reasons:

6 1). Plaintiff's counsel has a scheduling conflict which just arose in another  
7 case on September 15, 2011 that requires his appearance in a matter pending in Los Angeles  
8 County Superior Court entitled *Progressive Insurance Company vs. Norcold, Inc., et al.*,  
9 LASC No. BC 397219.

10 2). Pioneer, Inc., a new party to the action (via the Amended Third Party  
11 Complaint filed by Kenneth Welch) has not yet filed an appearance in this action;

12 3). Third party defendant CPI Global Sourcing Inc. has filed a counterclaim  
13 against Kenny's Rod Shop, Dennis Taylor individually and dba Dennis Taylor Restorations  
14 and Reproductions, Pioneer, Inc and Pioneer Automotive Industries, LLC. None of these  
15 counter-defendants have made an appearance in this action, with the exception of Kenny's  
16 Rod Shop,

17 4). Because all of the parties are not yet before the court, and due to the  
18 scheduling conflict regarding plaintiff's counsel, the parties request tha the initial conference  
19 in this matter be continued to October 6, 2011.

20  
21 DATED: 9/1/11

LAW OFFICES OF TERRENCE A.  
BEARD

22  
23 /s/ TERRENCE A. BEARD

24  
25 By: \_\_\_\_\_

26 TERRENCE A. BEARD  
27 Attorneys for Plaintiff STATE FARM

GENERAL INSURANCE COMPANY

DATED:

DIEPENBROCK & COTTER, LLP

/s/ JOHN P. COTTER

By:

JOHN P. COTTER  
Attorneys for Defendant KENNETH  
WELCH, individually and dba KENNY'S  
HOT ROD SHOP

DATED:

DONAHUE BATES BLAKEMORE &  
MACKEY

/s/ WILLIAM K. BLAKEMORE

By:

WILLIAM K. BLAKEMORE  
Attorneys for Third-Party Defendant and  
Cross-Complainant CPI GLOBAL  
SOURCING, INC.

9/9/11

FINAL CONTINUANCE.

